

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:

Implementation of 911 Act

The Use of N11 Codes and Other
Abbreviated Arrangements)
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WT Docket No. 00-110

CC Docket No. 92-105

COMMENTS OF SCC COMMUNICATIONS CORP.

SCC Communications Corp. ("SCC"),¹ pursuant to the Commission's August 29, 2000 Notice of Proposed Rulemaking in WT Docket 00-110 and Third Notice of Proposed Rulemaking in CC Docket No. 92-105,² hereby submits these comments in the above-captioned proceeding.³ The FCC's release designates 9-1-1 as the universal emergency number and seeks comment on several related issues.

INTRODUCTION

This proceeding stems from the passage of the Wireless Communications and Public Safety Act of 1999 ("911 Act"),⁴ enacted on October 26, 1999. The 911 Act seeks to enhance public safety by directing the Commission to encourage and support the States

¹ SCC Communications Corp. (NASDAQ: SCCX) is the leading provider of 911 data management services to incumbent local exchange carriers, competitive local exchange carriers ("CLECs"), integrated communications providers, and wireless carriers in the United States. SCC is also the designated 911 database management provider for the State of Texas.

² See Notice of Proposed Rulemaking, WT Docket No. 00-110, Third Notice of Proposed Rulemaking, CC Docket No. 92-105 (rel. August 29, 2000) ("Notice").

³ See Fourth Report and Order, CC Docket No. 92-105 (rel. August 29, 2000).

⁴ Wireless Communications and Public Safety Act of 1999, Pub. L. No. 106-81, enacted Oct. 26, 1999, 113 Stat. 1286, amending the Communications Act of 1934, 47 U.S.C. §§ 222, 251 (911 Act).

in deploying comprehensive emergency communications across the country so that all jurisdictions offer seamless, ubiquitous networks for prompt emergency service.⁵

In addition to designating 9-1-1 as the universal emergency telephone number, the Commission seeks comment on appropriate transition periods for areas in which 9-1-1 is not currently in use as an emergency number. The Commission also requests comment on how the FCC should facilitate States' efforts to deploy comprehensive emergency communications systems.

I. APPROPRIATE TRANSITION PERIODS

The Commission questions how much time should be allowed for those areas without 9-1-1 to implement the 9-1-1 universal emergency service number.⁶ Because the provision of basic emergency service in today's society is so critical to saving lives, the transition period should generally be no more than six months from release of the Commission's order in response to the Notice in this proceeding.

SCC does not believe that an extended timeframe to implement a single universal emergency number is necessary. Indeed, the transition to nationwide 9-1-1 is a more a matter of educating the public than it is a matter of making significant technological modifications to existing networks. In this regard, it is generally recognized that all telecommunications carriers currently have the capability to deliver 9-1-1 telecommunications services today.

Because lives are at stake, the Commission should take a strong approach to deploying the designated 9-1-1 emergency telephone number in as short a timeframe as

⁵ 911 Act at Section 3(b).

⁶ Notice at ¶ 19.

possible. Much like implementing a new area code, some period of time should be provided so that consumers can become familiar with the new number designation. This should not take more than six months, however, since most Americans already believe that 9-1-1 is currently the universal emergency number. Perhaps for rural communities that currently have no centralized emergency service program for wireline customers, the Commission might consider granting a longer transition period of up to one year.

II. FACILITATING STATEWIDE DEPLOYMENT

As noted above, the bigger concern in establishing a universal emergency number may very well be in educating telephone users that 9-1-1 is the single source for contacting emergency service. There will be, of course, that percentage of the population that currently believes 9-1-1 is already the designated universal number, but for those citizens who are conditioned to call other numbers, coordinated efforts to achieve a nationwide communications plan need to be undertaken. As the Commission noted, this coordinated effort is the responsibility not only of federal and state leadership, it requires the input of local jurisdictions as well.⁷

SCC suggests that the Commission conduct forums and meetings with wireline and wireless carriers, vendors, PSAPs and state public safety officials to develop and coordinate plans for the comprehensive deployment of emergency communications systems, including wireless Phase I E9-1-1. The Commission should also develop guidelines for incumbent local exchange carriers regarding their duties and responsibilities under the Communications Act and Commission rules to ensure that the public can receive wireless E9-1-1 services. Additionally, the Commission should

⁷ Notice at ¶ 24.

consider enforcement actions against wireline carriers that impede Phase I E9-1-1 implementation.

CONCLUSION

SCC applauds the Commission's efforts to implement the 911 Act, including a quick transition to a universal 9-1-1 emergency number and increased implementation of wireless E9-1-1 and other emergency communications services. SCC appreciates the opportunity to share its views on how the Commission can assist the States in deploying a seamless and reliable network to meet the public's safety and emergency needs. SCC believes that the transition period to implement the universal 9-1-1 number should generally be no more than six months from issuance of an order in response to the Notice in this proceeding. In addition, SCC encourages the Commission to hold forums and disseminate information on 9-1-1 implementation.

Respectfully submitted.

SCC COMMUNICATIONS CORP.

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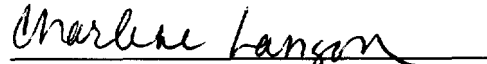
CERTIFICATE OF SERVICE

I, Charlene Langon, hereby certify that on this 16th day of October 2000, I caused copies of the foregoing "Comments of SCC Communications Corp." to be sent to the following by hand delivery:

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